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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
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Pam Hartman Beyer, Clerk of Court

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	MAG. NO. 22-1049 KJM
)	
Plaintiff,)	CRIMINAL COMPLAINT;
)	AFFIDAVIT IN SUPPORT OF
vs.)	CRIMINAL COMPLAINT
)	
ALDEN BUNAG,)	
)	
Defendant.)	
)	

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief.

COUNT 1

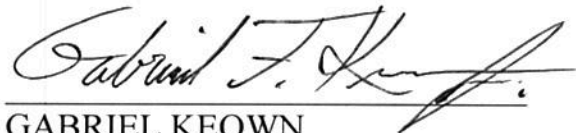
**Distribution of Child Pornography
(18 U.S.C. § 2252A(a)(2) and (b))**

From dates in or around November 2019 through at least October 2021, within the District of Hawaii and elsewhere, ALDEN BUNAG, the defendant, knowingly distributed any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(2) and (b).


I further state that I am a Special Agent with the Federal Bureau of Investigation (FBI) and that this Complaint is based upon the facts set forth in the attached "Affidavit in Support of Criminal Complaint," which is incorporated herein by reference.

DATED: June 15, 2022, Honolulu, Hawaii.



GABRIEL KEOWN
Special Agent
Federal Bureau of Investigation

Sworn to under oath before me telephonically, and attestation acknowledged pursuant to Federal Rule of Criminal Procedure 4.1(b)(2), on this 15th day of June, 2022, at Honolulu, Hawaii.


Kenneth J. Mansfield
United States Magistrate Judge

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

INTRODUCTION

1. This affidavit is submitted for the purpose of establishing probable cause that ALDEN BUNAG (“BUNAG”), the defendant, committed the following offense from dates in or around November 2019 through at least October 2021 within the District of Hawaii and elsewhere: 18 U.S.C. § 2252A(a)(2), which makes it a crime to knowingly receive or distribute child pornography that has been mailed, shipped, or transported interstate or foreign commerce by any means, including by computer.

2. I am a Special Agent with the Federal Bureau of Investigation, Honolulu Field Office. I have been a Special Agent since September 2019 and have worked a variety of investigations. Currently, I am assigned to the Violent Crime Task Force, working on investigations into crimes against children. As part of my current duties, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography. Through my training and experience, I have had the opportunity to observe and review numerous examples of child pornography in various forms of media including computer and

cellphone media. I have utilized court-authorized search warrants, conducted physical surveillance, attended trainings, and interviewed subjects and witnesses regarding violent crimes against children cases.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement agents and witnesses. Specifically, I have personally conferred with FBI Special Agents in Philadelphia regarding the related matter that they have investigated and the child pornography that they have reviewed with respect to BUNAG, further described below. This affidavit is intended to show merely that there is sufficient probable cause for the offenses in the requested Complaint and does not set forth all of my knowledge or facts about this matter.

PROBABLE CAUSE

4. In or around July 2021, FBI Philadelphia received a Cybertip identifying a subject known as AW, a teacher at a private K-12th grade school in Philadelphia. The Cybertip indicated AW had uploaded child pornography to his account.

5. In or around October 2021, FBI Philadelphia executed a Search Warrant on the residence and person of AW in Philadelphia and seized AW's cellphone, among other items. AW was arrested pursuant to probable cause and charged with one (1) count of Distribution of Child Pornography, one (1) count of

Receipt of Child Pornography, and one (1) count of Willfully causing the Distribution of Child Pornography.

6. FBI Philadelphia agents reviewed AW's cellphone and found numerous conversations over the messaging application, Telegram, which discussed and traded child pornography with others. AW also posed as a minor on social media applications to bait minors into creating and sending him child pornography, including by targeting his own middle school students.

7. During the review of AW's device, FBI Philadelphia Agents found a Telegram chat between AW (with display name "mr p") and an individual with the display name "Alden," hereinafter the Alden "BUNAG." Between March 31, 2018, and October 1, 2021, agents identified that AW and the BUNAG exchanged over 3,392 messages, to include hundreds of images and video files.

8. AW's cellphone was processed while disconnected from all networks, and consequently the content of many of the images and video files were not viewable and show up in the chats as "empty file." However, FBI Philadelphia agents were able to review and described the following:

- a. Three videos of child pornography, sent on or about August 19, 2021:
 - i. LatinoCuties7- BUNAG sent a 33 second video of a nude minor boy, sitting up on his knees, appearing to perform anal sex on a nude adult. Due to the angle of the camera, the genitals are not clearly visible. There is audio during the video. It sounds like the adult male is moaning. The video freezes at 8 seconds.

- ii. Telegram-cloud-document-1-5129822008204329124- BUNAG sent a 44 second video of a nude minor boy laying down on his back. There is an adult male performing anal sex on the boy. During the video, the adult male occasionally masturbates the boy's penis. The adult male slaps the boy in the face and pulls on the boy's hair multiple times. At times, the adult male uses his hand to cover the boy's mouth. There is audio during the video. It sounds like the boy is wincing in pain and the adult male is speaking to him in a language other than English.
- iii. Telegram-cloud-document-1-5177133886173348143_partial – BUNAG sent 48 second video of a nude minor boy, masturbating his penis, and then performing oral sex on an adult male. There is audio during the video. It sounds like the adult male is speaking to the boy in a language other than English. The video freezes at 26 seconds
- b. Six (6) non-pornographic photos of BUNAG's students were sent on or about July 11, 2021.
- c. Three (3) anime photographs

9. Based on the agents' review, it is unclear at this stage if it is BUNAG himself in one or more of the videos or if the boy depicted in one of the videos is one of BUNAG's students. However, FBI Philadelphia Agents believe the boy in one of the videos resembled one of the photographs of a male on BUANG's Instagram account "AMB.CREATIVE_Media." The Agents noted the post was from the BUNAG's media Instagram account made on May 2, 2022.

10. The FBI Philadelphia Agents noted that throughout the Telegram chat with AW and BUNAG, BUNAG noted the following information, which agents later confirmed aligned with BUNAG:

- a. lived in Hawaii
- b. was Filipino
- c. worked at multiple schools as a substitute teacher

- d. taught dance
- e. date of birth was XX/XX/1988
- f. takes senior high school photographs and family photographs
- g. wanted to use the following names for his photography business:
AMB.CREATIVEMEDIA or ALDEN.ALTERNATEMEDIA
- h. initials were AMB
- i. shared empty files with AW
- j. sent visible files of child pornography

11. FBI Philadelphia Agents further believe that based on the surrounding Telegram chats from November 10, 2019 that FBI agents have reviewed, that some of the empty files contain videos of the BUNAG having sexual intercourse with a boy identified by name and referred to herein as minor victim 1, "MV1," age 13. Based on the chats between AW and BUNAG, BUNAG claimed to have sex with MV1 at the school during lunch breaks.

12. On June 15, 2022, FBI Special Agents in Honolulu, Hawaii, executed search warrants at BUNAG's residence and on his person. Agents confirmed BUNAG's identification and approached him at a high school located on Oahu. BUNAG was working at the high school as a summer school teacher.

13. BUNAG consented to a voluntary interview with agents. BUNAG admitted that he had prior sexual contact, that is, he admitted to having anal sexual intercourse multiple times, with a then-13-year-old identified as MV1. In the interview, BUNAG described MV1 as a former student and knew that he was a minor at the time of the sexual encounters. BUNAG used camera equipment to record the sexual encounter. He also admitted to distributing the video recording

of his sexual contact with MV1 to AW and others using Telegram. Further BUNAG admitted to distributing child pornography involving other minor victims.

14. During the interview, agents reviewed two video recordings of BUNAG's sexual conduct with MV1 and one image of BUNAG's sexual contact with MV1 saved on BUNAG's Telegram account located on BUNAG's cellphone. Agents also were able to discern that BUNAG sent at least one video of MV1 to AW. Agents further reviewed numerous images and videos identified as child pornography that were sent to AW and others.

15. Based on the information obtained on June 15, 2022 from the interview of BUNAG and the video reviewed on BUNAG's cellphone, as well as the other information described in this affidavit, FBI agents arrested BUNAG at the high school based on probable cause.

CONCLUSION

WHEREFORE, based on the aforementioned facts, I respectfully submit that there is probable cause to conclude that Alden BUNAG committed the offense of 18 U.S.C. § 2252A(a)(2).

Respectfully submitted,



GABRIEL KEOWN

Special Agent

Federal Bureau of Investigation

Sworn to under oath before me telephonically, and attestation acknowledged pursuant to Federal Rule of Criminal Procedure 4.1(b)(2), on this 15th day of June, 2022, at Honolulu, Hawaii.



A handwritten signature in blue ink, appearing to read "K. Mansfield".

Kenneth J. Mansfield
United States Magistrate Judge